

March 25, 2020

**REVISED March 28, 2020 following discussion with Wanda Calderon on March 27, 2020**

Regional Freedom of Information Officer  
U.S. EPA, Region 2  
290 Broadway, 26<sup>th</sup> Floor  
New York, NY 10007-1866

Re: Freedom of Information Act Request, EPA Region 2, Site ID: San German  
Groundwater Contamination Superfund Site, San German, Puerto Rico,  
PRN0000205957

Dear Sir/Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. §§ 552 et seq., and regulations thereunder, I hereby request copies of the following.

- (1) Copies of all documents received, collected, or maintained by EPA relating to current or former operations in:

Retiro Industrial Park  
Calle A, Calle B, or Calle C  
San German, Puerto Rico 00683

of the following tenants or related names:

Swiss Handloom; Northwest Knitting Loom; Coopervision PR; Northridge Knitting Mills;  
Fashions Knitwear Inc.; Baytex International; Bay-Tex International Corp.;

Midland Knitting Mills, Inc.; Eastfield Knitting Mills Inc.;

Digital Equipment Corporation; DEC; Digital Equipment Corporation de Puerto Rico;

This request includes, but is not limited to, information related to manufacturing operations or storage and/or use of hazardous chemicals (including trichloroethylene and other solvents) by Digital Equipment Corporation or any of its subsidiaries including, but not limited to, Digital Equipment Corporation de Puerto Rico. This request also includes any lease or construction related documents for Digital Equipment Corporation. Further, this request includes any information related to environmental liabilities retained in any sale of Digital Equipment Corporation assets. This request includes any information related to any hazardous chemical spills or underground storage tanks at any Digital Equipment Corporation operations in Retiro Industrial Park, as well as information related to any meetings between any Digital Equipment Corporation personnel and EPA Superfund personnel in the 1980s. This request also includes any shipments and/or disposals of hazardous wastes originating at any Digital Equipment Corporation facility, including metal hydroxide sludges. This request also includes any consent judgments or orders, remedial, and information related to civil penalties for Digital Equipment Corporation operations. Finally, this request also includes documents related to any environmental sampling/audits industrial waste

New Jersey

California

Georgia

Illinois

Mississippi

New York

Puerto Rico

Canada



treatment systems evaluations, or hydrogeologic or industrial hygiene evaluations at any Digital Equipment Corporation entity. An index of RCRA files would be appreciated.

CCL Insertco; Menasha Insertco Acquisition Company; Insert Corporation of Puerto Rico; Insertco of PR; Lucas Insertco Pharmaceutical Printing; John D. Lucas Printing Co.; CCL Insertco Puerto Rico, Inc.; CCL Label Inc.; CCL Label (San German), Inc;

Caribe GE; General Electric; Circuit Breakers, Inc.; General Electric Circuit Breakers, Inc.; Caribe GE Distribution Components, Inc.; Caribe General Electric Products, Inc.; General Electric Circuit Breaker, Inc.; Caribe GE Products; Caribe General Electric San German; and Caribe General Electric Product San German.

This request includes, but is not limited to, information related to any of the above entities' (collectively, "GE") annual reports regarding RCRA Generator Inspections, as well as sampling and analysis activities at any location within Retiro Industrial Park at which GE operated. Further, this request also includes any information related to spent halogenated solvents used in degreasing operations by GE, as well as hazardous waste shipments from GE. Finally, this request includes any information related to a crack in the concrete pad located at any facility within Retiro Industrial Park at which GE operated, as well as any Notices of Deficiency, RCRA violations, or enforcement actions related to same. An index of RCRA files would be appreciated.

Tropical Fruit Products; TC Van Heusen; Paresian Maid Lingerie Co.; Parisien Made Lingerie; Gerber Louis; Autoridad de Energy Electric;

IO Lab Pharmaceuticals;

Elegant Sleepwear; Omni Research; Caribbean BioLab; Pace Analytical; Nite Fashions, Inc.;

Caribe Sports; International Silver De PR; Wallace International de PR; Wallace International Silversmiths; Wallace Silver de PR, Ltd.; Wallace Silversmiths de Puerto Rico, Ltd.; Insilco Corporation; Katy Industries; and Syratech.

This request also includes all drawings provided to EPA by the Puerto Rico Industrial Development Authority (PRIDCO) in their July 9, 2015 letter to Henry Guzmán in response to an information request under CERCLA. (See Response to Question 3 at p. 6 of the letter)

- (2) Copies of all documents received, collected, or maintained by EPA relating to other entities operating or properties at locations as follows:

Acorn Cleaners (Route 122, Antongiorgie Building);

Garage Rodriguez (Calle Luna - Across from Santa Rosa de Lima Church);

Abandoned Gulf Station (State Road 122);

HP/PCB Horizon, Digital Equipment Corporation (PRD991291857), Circo Caribe Corp. and Via Systems de PR, Inc (110041992626). (Road or Route 362).

This request includes, but is not limited to, all RCRA documents, reports and references associated with this facility including, for example, Hydrogeological Evaluation Report(s) by Goldberg-Zoino and Associates (GZA) and also includes CERCLA response records and reports. This request also includes copies of all responses received by the EPA in response to all requests for information pursuant to 42 U.S.C. § 9604(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("104(e) requests") issued in connection with the PCB Horizon Site located at Route 362 in San German, PR.

Cordis/OMJ Pharmaceutical (Road 362);

Baxter Healthcare (Road 122); and

Any information related to current or former private water supply or water production wells in the area of any these entities (see, for example, Industrial Park Wells 264 and 412 in Rodriguez 2004 [USGS]).

Programs from which information is desired:

Air, Brownfields, Enforcement & Compliance, Superfund, Solid Waste and Emergency Response, RCRA Hazardous Waste, UST, EPCRA, TRI, TSCA, Underground Injection Control (UIC) and Legal Departments/Office of General Counsel. We would like to obtain indexes of RCRA and Superfund files.

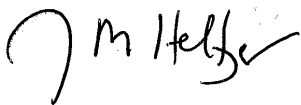
This company agrees to pay any reasonable fees and costs incurred for locating documents for review, in addition to any subsequent costs for duplication. Before copying the requested documents, however, kindly provide me with an estimate as to the volume of the documents to be copied and the associated cost. Finally, to the extent possible, we request that documents be produced on a rolling basis. We understand that documents will be supplied electronically in digital format to the extent possible.

In order to reduce the burden on EPA staff during these challenging times induced by COVID-19, we exclude e-mails from this request but reserve our rights to ask for these materials in a subsequent or modified request.

If you have any questions regarding this request, please do not hesitate to contact me.

Sincerely,

FIRST ENVIRONMENT, INC.



Josh Heltzer  
Senior Associate